

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	Criminal No. 21cr10290
	)	
v.	)	Violations:
	)	
RICARDO VOLTAIRE,	)	<u>Count One:</u> Conspiracy to Commit Wire Fraud
	)	(18 U.S.C. § 1349)
	)	
Defendant	)	<u>Forfeiture Allegation:</u>
	)	(18 U.S.C. § 981(a)(1)(C) and
	)	28 U.S.C. § 2461)
	)	

INFORMATION

At all times relevant to this Information:

General Allegations

1. RICARDO VOLTAIRE (“VOLTAIRE”) was a resident of Massachusetts.
2. The Retailer was a retail company doing business in Massachusetts and across the United States. VOLTAIRE was an employee of the Retailer.
3. Wagner SOZI was a resident of Massachusetts.
4. Person 1 was a resident of Massachusetts.
5. Citi was a financial services company headquartered in New York City. Citi processed store credit accounts for the Retailer.

Overview of the Conspiracy

6. From, at least, in or about January 2019 through in or about September 2019, VOLTAIRE conspired with SOZI and Person 1 to submit applications for fraudulent Retailer store credit accounts under the names of dozens of victims.

Object and Purpose of the Conspiracy

7. The object of the conspiracy was to commit wire fraud by creating fraudulent Retailer store credit accounts under the names of dozens of victims. The principal purpose of the conspiracy was for VOLTAIRE, SOZI, and Person 1 to use these accounts to purchase Visa gift cards, and to divide the fraudulent proceeds amongst themselves.

Manner and Means of the Conspiracy

8. Among the manner and means by which VOLTAIRE, SOZI, and Person 1 carried out the conspiracy were the following:

- a. SOZI and Person 1 would visit the Retailer and use false identifications to apply for store credit accounts;
- b. VOLTAIRE would process these fraudulent applications and cause the information concerning the applicant to be transmitted interstate to Citi;
- c. SOZI and Person 1 would use the resulting store credit account to purchase Visa gift cards from the Retailer, with the charges being attributable to the pertinent victim's credit account with Citi; and
- d. SOZI and/or Person 1 would kick back cash and other remuneration derived from the scheme to VOLTAIRE.

Acts in Furtherance of the Conspiracy

9. In furtherance of the conspiracy and the scheme to defraud, VOLTAIRE, SOZI, and Person 1 committed the following acts, among others:

- a. On August 13, 2019, Person 1 submitted a store credit application using another person's identity at a location of the Retailer in Braintree, Massachusetts.
- b. On August 13, 2019, VOLTAIRE processed that application, causing Citi to approve a credit account.

- c. On August 13, 2019, Person 1 used that credit account to purchase more than \$1,000 in Visa gift cards from the Retailer.
- d. On August 13, 2019, SOZI submitted a store credit application using another person's identity at a location of the Retailer in Braintree, Massachusetts.
- e. On August 13, 2019, VOLTAIRE processed that application, causing Citi to approve a credit account.
- f. On August 13, 2019, SOZI used that credit account to purchase more than \$1,200 in Visa gift cards from the Retailer.

COUNT ONE

Conspiracy to Commit Wire Fraud  
(18 U.S.C. § 1349)

The United States Attorney charges:

10. The United States Attorney re-alleges and incorporates by reference paragraphs 1-9 of this Information.

11. From, at least, in or about January 2019 through in or about September 2019, in the District of Massachusetts, and elsewhere, the defendant,

RICARDO VOLTAIRE,

conspired with SOZI and Person 1, and with others known and unknown to the United States Attorney, to commit wire fraud, that is, having devised and intending to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted, by means of wire communications in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing the scheme to defraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION  
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1349, set forth in Count One, the defendant,

RICARDO VOLTAIRE,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant –


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

NATHANIEL R. MENDELL

Acting United States Attorney

By:   
WILLIAM F. ABELY  
Assistant U.S. Attorney

Dated: September 28, 2021